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June 26, 2012

The Honorable Paul S. Diamond
United States District Court for the
Eastern District of Pennsylvania
6613 United States Courthouse
601 Market Street,
Philadelphia, PA 19106

FILED

JUL - 9 2012

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

Re: *The Abi Jaoudi and Azar Trading Corp. v. Cigna Worldwide Ins. Co.*, C.A. #91-6785

Dear Judge Diamond:

We represent the Echemus Entities and James Little in the above-referenced action. Last evening Movant, Cigna Worldwide Ins. Co. (CWW), filed its Reply Memorandum in Further Support of its Amended Motion for Contempt. That motion had appended to it many pages of exhibits.

In our view, with this filing, the issue is joined with regard to whether our client should be a target of this motion and subject to extensive and burdensome discovery. For that reason, we request that the Court schedule a Rule 16 conference with the parties to attempt to address the pending issues in an expeditious manner to avoid burdening the Court with plowing through the pleadings and holding extensive hearings. Our goal in this request is to alleviate the burden on the Court and our clients.

In addition, CWW filed its supporting materials publicly. Those materials include not only confidential financial information but information about other, entirely unrelated litigation matters that is subject to privilege and work product protection. We took great pains to protect this information in our filing and informed all parties that this information was highly confidential. We ask that CWW's counsel immediately place the filing under seal, or the Court order that it be sealed if CWW does not act to do so, pending a conference.

If the Court is so inclined, I am available to organize such a status conference.

I have also filed this letter electronically so that service will be made on all counsel.

Respectfully,



Joseph A. Tate